

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa
Ramirez, Valerie Seyler, and Jannien Weiner,

Plaintiffs,

vs.

Wells Fargo & Co.; Employee Benefit
Review Committee; and Wells Fargo Bank,
National Association,

Defendants.

Case No. 0:20-cv-02016 (KMM/BRT)

**PLAINTIFFS' MOTION FOR
PRELIMINARY APPROVAL OF
CLASS ACTION SETTLEMENT
AND PROVISIONAL CLASS
CERTIFICATION**

CLASS ACTION

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner (collectively "Plaintiffs"), by their counsel, hereby move this Court for entry of an Order: (1) granting preliminary approval of the proposed Class Action Settlement and Settlement Agreement; (2) certifying the Settlement Class (as defined below) for settlement purposes under Federal Rule of Civil Procedure 23(a), 23(b)(1), or in the alternative, 23(b)(2); (3) appointing Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner as Settlement Class Representatives and appointing Cohen Milstein Sellers & Toll PLLC, Keller Rohrback LLP and Zimmerman Reed LLP as Class Counsel pursuant to Federal Rule of Civil Procedure 23(g); (4) approving the form and manner of notice; and (5) setting a date for a Fairness Hearing.

The proposed Settlement Class is defined as:

All Participants of the Wells Fargo & Company 401(k) Plan at any time between March 13, 2014, through the date on which the Settlement becomes Final. Excluded from the Settlement Class are members of the

Employee Benefits Review Committee from March 13, 2014 through the date on which the Settlement becomes Final.

This Motion is based on the record in this case, Plaintiffs' Memorandum of Law in Support of this Motion, the Declaration of Michelle Yau in Support of this Motion and exhibits attached thereto, the Declaration of Richard W. Simmons of Analytics Consulting, LLC and exhibits attached thereto, as well as the forthcoming argument of counsel and the record on file.

Dated: April 1, 2022

By: /s/ Michelle C. Yau

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***Counsel for Plaintiffs and the proposed
Settlement Class***